

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

KALEB COLE,

Defendant.

CASE NO. CR20-032JCC

**GOVERNMENT'S EXHIBIT LIST
(First Amended)**

The United States of America, by and through Tessa M. Gorman, Acting United States Attorney for the Western District of Washington, and Thomas M. Woods and Seth Wilkinson, Assistant United States Attorneys, respectfully submits this second exhibit list. The government reserves the right to supplement this list, and to introduce any exhibits listed by the defense on its exhibit list.

0-99 Series: Search of Cole's Texas Residence

1. Map of house
2. Photograph of front of house
3. Photograph of living room 1
4. Photograph of living room 2
5. Photograph of Cole's room—AWD flag

6. Photograph of Cole's room—AWD flag
7. Photograph of AWD flag from Cole's room
8. Photograph of AWD flag from living room closet
9. Photograph of AWD patch from living room
10. Photograph of Cole's room—Nazi flag
11. Photograph of Cole's room—Position of desk
12. Photograph of Cole's room—Cole's desk, HP laptop and Dell Desktop
13. Photograph of wallet on Cole's desk
14. Photograph of identity cards from Cole's room 1
15. Photograph of identity cards from Cole's room 2
16. Photograph of identity cards from Cole's room 3
17. Photograph of Cole's passport found in his room 1
18. Photograph of Cole's passport found in his room 2
19. Photograph of thumbdrives from Cole's room 1 and Dell desktop
20. Photograph of thumbdrives on desk in Cole's room 2, and Dell Desktop
21. Photograph of position of Cole's closet
22. Photograph of Cole's closet
23. Photograph of AWD jackets in Cole's closet
24. Photograph of Cole's car
25. Cole's car registration
26. Photograph of skull masks from Cole's car

100 Series: Encrypted Communications Regarding the Plot

100. Chats between Krokodil and Swiss Discipline
101. Operation Erste Saule chats—set 1
102. Operation Erste Saule chats—set 2
103. Operation Erste Saule chats—set 3
104. Operation Erste Saule chats—set 4

105. Operation Erste Saule chats—set 5
106. Operation Erste Saule chats—set 6
107. Operation Erste Saule chats—set 7
108. Operation Erste Saule chats—set 8
109. Operation Erste Saule chats—set 9
110. Operation Erste Saule chats—set 10
111. Email dated January 7, 2020 with attachments

200 Series: January 9, 2020 Audio and Video at Cole’s Residence

200. Audio 1 – Greeting
201. Audio 2 – Cole talks about Extreme Risk Protection Order
202. Audio 3 – Cole talks about C.I.
203. Audio/Video 4 – Cole talks about the plot
204. Audio 5 – Cole talks about the plot
205. Reserved
206. Reserved
207. Photograph of Cole from meeting
208. King 5 video referenced by Cole

300 Series: Arizona Victim

300. Photograph of front of house 1
301. Photograph of bedroom window (side view)
302. Photograph of bedroom window 1
303. Photograph of bedroom window 2
304. Photograph of bedroom window 3
305. Photograph of Arizona victim poster
306. Photograph of Arizona victim poster from inside house
307. Photograph of Arizona victim poster from inside house

400 Series: Florida Victims

- 400. Photograph of front of Florida house
- 401. Close up photograph of Florida house where poster had been hanging
- 402. Photograph of Florida victim poster
- 403. Photograph of back of Florida poster showing glue mark

500 Series: Washington Victims

- 500. Photograph of envelope addressed to C.I.
- 501. Photograph of C.I. poster
- 502. Photograph of envelope addressed to M.C.
- 503. Photograph of M.C. poster
- 504. Photograph of envelope addressed to H.B.
- 505. Photograph of H.B. poster

600 Series: Materials Tying Cole to Moniker

- 600. Cipher found in Cole's cell
- 601. Documents found in Cole's cell regarding use of cipher
- 602. October 17, 2021 chat between Cole and Swiss Discipline
- 603. November 8, 2019 chat between Cole and others
- 604. King 5 article linked in Exhibit 603
- 605. December 2019/January 2020 chat between Cole and others
- 606. Audio recording of August 24, 2019 Nuclear Congress—Clip 1
- 607. Audio recording of August 24, 2019 Nuclear Congress—Clip 2

700 Series: Miscellaneous

- 700. November 1, 2019 Nuclear Congress chat
- 701. September 15, 2018 recording of Cole speaking

- 702. Photograph of Shea purchasing stamps from Fred Meyer
- 703. Fred Meyer business record of items purchased by Shea
- 704. Santa Claus stamps purchased by FBI from Fred Meyer
- 705. Photograph of Cole and Shea together
- 706. Photograph of LaBianca crime scene with “Death to Pigs”

800 Series: Digital Evidence

- 800. AWD icon from thumbdrive
- 801. Slack space data from entry from HP laptop
- 802. Photo of Cole 1 from HP laptop
- 803. Photo of Cole 2 from HP laptop with file name (“myselfnadkan.png”)
- 804. Photo used for Cole moniker from HP laptop
- 805. Slack space data from Dell laptop
- 806. Screenshots of forensic search results from seized devices
- 807. Summary of data found in slack space
- 808. Demonstrative exhibit depicting slack space

DATED: September 23, 2021

Respectfully submitted,

TESSA M. GORMAN

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/s/ Thomas M. Woods

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